

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ESTATE OF CHRISTOPHER J. DAVIS and
DORETHA LOCK, as the Special Administrator of
the Estate of Christopher J. Davis,

Case No.: 18-CV-01846

Plaintiffs,

v.

JUAN ORTIZ, WALWORTH COUNTY, a municipal
corporation, KURT PICKNELL,
TOWN OF EAST TROY, a municipal corporation,
VILLAGE OF EAST TROY, a municipal corporation,
JAMES R. SURGES, ALAN BOYES,
JEREMY SWENDROWSKI, MATTHEW WEBER,
PAUL SCHMIDT, CRAIG KNOX, JEFF PRICE,
AARON HACKETT, JOSE G. LARA,
ROBERTO JUAREZ NIEVES, Jr.,
ABC INSURANCE COMPANY,
DEF INSURANCE COMPANY and
XYZ INSURANCE COMPANY,

Defendants.

**MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT JOSE G. LARA**

Plaintiffs, by their attorneys, requests that entry of judgment by default be entered against Defendant Jose G. Lara pursuant to Federal Rule of Civil Procedure 55(b). In support of this request, Plaintiffs relies upon the record in this case and the Declaration of Nathaniel Cade, Jr.

Dated this 30th day of January, 2019.

CADE LAW GROUP LLC

By: s/Nathaniel Cade, Jr.
Nathaniel Cade, Jr.
P.O. Box 170887



Milwaukee, WI 53217
(414) 255-3802 (phone)
(414) 255-3804 (fax)
nate@cade-law.com
Attorneys for Plaintiffs